

# Exhibit B

**From:** [Caroline Small](#)  
**To:** [Jeffrey Neiman](#); [Jason Mays](#)  
**Cc:** [Erin Green](#); [andy.phillips@mwpp.com](#); [shannon.timmann@mwpp.com](#); [rcedillo@lawdcm.com](#); [Jason Davis](#); [Rachel Garza](#); [Danielle Grote](#); [Jasmine Capetillo](#); [Dela Valdez](#); [Hailey Cho](#)  
**Subject:** RE: Paul v. Findeisen, et al.  
**Date:** Friday, January 31, 2025 11:51:00 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
**Importance:** High

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Jeff,

It occurred to me that we didn't expressly discuss the deadline for us to respond to the pending MTC in our phone call – which is due today. We intended to ask for an extension of the deadline in light of my international travel and Jason's trial, to February 14 so it lines up with the other deadlines. We will be filing a MFE today.

For purposes of the COC, are you agreeable to that extension?

Thanks,  
Caroline

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**From:** Jeffrey Neiman <jneiman@mnrlawfirm.com>  
**Sent:** Friday, January 31, 2025 8:26 AM  
**To:** Jason Mays <jmays@mnrlawfirm.com>  
**Cc:** Erin Green <egreen@dslawpc.com>; andy.phillips@mwpp.com; shannon.timmann@mwpp.com; rcedillo@lawdcm.com; Jason Davis <jdavis@dslawpc.com>; Caroline Small <csmalldslawpc.com>; Rachel Garza <Rgarza@dslawpc.com>; Danielle Grote <dgtote@dslawpc.com>; Jasmine Capetillo <jcapetillo@dslawpc.com>; Dela Valdez <dvaldez@dslawpc.com>; Hailey Cho <hcho@dslawpc.com>  
**Subject:** Re: Paul v. Findeisen, et al.

*[This message came from the outside. Do not click links or open attachments unless you know the content is safe.]*

Please let us know by the COB today if this was an oversight or if you intend to assert privilege over the text string and if so, why, given your position on the emails?

Thank you.

Jeffrey A. Neiman  
Marcus Neiman Rashbaum & Pineiro LLP  
100 Southeast Third Avenue  
Suite 805  
Fort Lauderdale, Florida 33394  
Telephone: 954-462-1200

jneiman@mnrlawfirm.com

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On Jan 30, 2025, at 5:32 PM, Jason Mays <[jmays@mnrlawfirm.com](mailto:jmays@mnrlawfirm.com)> wrote:

Thank you. We note that your letter does not account for your privilege assertion over Mr. Findeisen's *text messages* with Mr. Kerkher (which is reflected at Row 16 of your privilege log of text messages), only his emails. Was that an oversight? Please confirm that this privilege assertion is being withdrawn, as well, and assuming that is the case please produce those text messages. Thanks, Jason

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**From:** Erin Green <[egreen@dslawpc.com](mailto:egreen@dslawpc.com)>  
**Sent:** Thursday, January 30, 2025 5:07 PM  
**To:** [andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com); [shannon.timmann@mwpp.com](mailto:shannon.timmann@mwpp.com); Jeffrey Neiman <[jneiman@mnrlawfirm.com](mailto:jneiman@mnrlawfirm.com)>; Jason Mays <[jmays@mnrlawfirm.com](mailto:jmays@mnrlawfirm.com)>; [rcedillo@lawdcm.com](mailto:rcedillo@lawdcm.com)  
**Cc:** Jason Davis <[jdavis@dslawpc.com](mailto:jdavis@dslawpc.com)>; Caroline Small <[csmall@dslawpc.com](mailto:csmall@dslawpc.com)>; Rachel Garza <[Rgarza@dslawpc.com](mailto:Rgarza@dslawpc.com)>; Danielle Grote <[dgrote@dslawpc.com](mailto:dgrote@dslawpc.com)>; Jasmine Capetillo <[jcapetillo@dslawpc.com](mailto:jcapetillo@dslawpc.com)>; Dela Valdez <[dvaldez@dslawpc.com](mailto:dvaldez@dslawpc.com)>; Hailey Cho <[hcho@dslawpc.com](mailto:hcho@dslawpc.com)>  
**Subject:** Paul v. Findeisen, et al.

Dear Counsel,

Please see the attached correspondence on behalf of Caroline Newman Small regarding the above referenced matter.

Additionally, below is the Dropbox link referenced in the attached correspondence:

[2025 01-30 Defendants' Supplemental Production](#)

Thank you for your attention and please contact our office if you have any questions.



**Erin Green**  
Trial Specialist

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<image007.png>

E:  
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